



## WESTERN PENNSYLVANIA SCHOOL FOR THE DEAF

Donald E. Rhoten, Superintendent

Honorable Julius Genachowski, Chairman  
Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Mignon Clyburn  
Commissioner Meredith Attwell Baker  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

Re: CG Docket Nos. 03-123 and 10-51

Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn, and Baker:

Video Relay Service (VRS) allows deaf individuals to communicate by videophone in American Sign Language, which is the primary language for our students. This life-altering broadband service is a vital link that connects deaf people to the hearing community—and vice versa. As the superintendent of one of the largest deaf K-12 schools in the nation, I cannot emphasize enough the importance of VRS in the lives of my students. It is a critical link to their families who may live in other areas. VRS is also an invaluable tool that can empower students after graduation in their search for employment.

Ensuring that deaf individuals have access to VRS and encouraging improvements in VRS should be a high priority for you as Chairman and Commissioners of the Federal Communications Commission. As a leader of a deaf school, I was deeply troubled to see the Commission's recent Public Notice on VRS rates and what it would mean for advancing VRS communication for my current and future students.

The Americans with Disabilities Act requires the FCC to make available to all deaf individuals nationwide "functionally-equivalent" communications. You should be increasing the availability and use of VRS, not cutting back. You should adopt a rate that encourages continuing improvements in VRS technology and services—technologies that keep pace with those of hearing people.

Progress towards functional equivalence will be destroyed if the FCC does not encourage VRS providers to improve VRS and make it more widely available. VRS is a recent and dramatic advancement that benefits those who are deaf, but so much more can be done. It would be tragic if the FCC were to destroy this broadband service that is so vital to the deaf and to the future of our deaf students.

You will soon determine the future of VRS. When you set the VRS rate, you will determine whether America makes progress toward the statutory goals of functional equivalence, nationwide access and inclusion – or not. I urge you to establish a fair and predictable rate for VRS that will encourage VRS providers to invest in improving VRS.

Respectfully,



---

**Additional messaging points:**

- VRS is a vital service for deaf people that must be perpetuated – not limited.
- The FCC proposal would be disastrous to the future of VRS service and VRS as we know it would go away.
- The FCC proposal would result in limited VRS access to thousands of deaf individuals.
- If the proposal were adopted, remaining VRS service would be plagued with long wait times and a shortage of interpreters.
- Under the FCC's proposal, advancements in VRS technology would be negatively affected.
- The FCC rate proposal does not promote functional equivalence as mandated in the Americans with Disabilities Act.